

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
CLIFFORD WHITE	:	VIOLATIONS:
WAYNE BRIGGS	:	21 U.S.C. § 846 (conspiracy to distribute
	:	and possess with intent to distribute 50
	:	grams or more of cocaine base (“crack”)
	:	and 500 grams or more of cocaine -1
	:	count)
	:	21 U.S.C. § 841(a)(1),(b)(1)(A) (possession
	:	with intent to distribute 50 grams or more
	:	of cocaine base (“crack”) -1 count)
	:	21 U.S.C. § 841(a)(1),(b)(1)(B) (possession
	:	with intent to distribute 500 grams or
	:	more of cocaine - 1 count)
	:	21 U.S.C. § 841(a)(1),(b)(1)(B) (possession
	:	with intent to distribute 5 grams or more
	:	of cocaine base (“crack”) -1count)
	:	21 U.S.C. § 841(a)(1),(b)(1)(C) (possession
	:	with intent to distribute cocaine - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about August 30, 2006, in Philadelphia in the Eastern District of Pennsylvania, defendants

CLIFFORD WHITE and
WAYNE BRIGGS

knowingly and intentionally conspired and agreed, together and with other persons unknown to the grand jury, to distribute and possess with intent to distribute 50 grams or more, that is,

approximately 413.9 grams, of a mixture and substance containing cocaine base (“crack,”) a Schedule II controlled substance, and 500 grams or more, that is approximately 1061 grams of a mixture and substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

MANNER AND MEANS

2. It was part of the conspiracy that defendants CLIFFORD WHITE and WAYNE BRIGGS possessed for distribution of approximately 413.9 grams of cocaine base (“crack cocaine”) and approximately 1061 grams of cocaine in the vicinity of 2231 S. 62nd Street in Philadelphia, Pennsylvania.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its object, defendants CLIFFORD WHITE and WAYNE BRIGGS committed the following overt acts, among others, in the Eastern District of Pennsylvania:

On or about August 30, 2006:

1. Defendant CLIFFORD WHITE drove to the shopping center at 62nd and Woodland Avenue, Philadelphia, PA, where defendant WAYNE BRIGGS was waiting in his car in the parking lot.

2. Defendant CLIFFORD WHITE signaled for defendant WAYNE BRIGGS to follow defendant WHITE in defendant BRIGGS’ car to the Locker-Room Storage Facility at 2231 S. 62nd Street, where the defendants stopped in front of locker #1704 and got out of their vehicles.

3. Defendant CLIFFORD WHITE used a key to enter the storage locker, while defendant WAYNE BRIGGS waited.

4. When defendant CLIFFORD WHITE came out of the storage locker, he handed defendant WAYNE BRIGGS a black plastic bag containing 3 knotted clear plastic bags containing approximately 289.7 grams in chunks of cocaine base (“crack”) and 1 knotted clear plastic bag containing approximately 124.4 grams of cocaine.

5. The interior of the locker # 1704 contained an additional 936.6 grams of cocaine in 8 knotted bags and approximately 124.2 grams of cocaine base (“crack”) in 2 clear knotted clear plastic bags, all contained inside 1 large clear plastic bag.

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1), (b)(1)(A), and (b)(1)(B).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 30, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**CLIFFORD WHITE and
WAYNE BRIGGS**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 50 grams or more, that is, approximately 413.9 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 30, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**CLIFFORD WHITE and
WAYNE BRIGGS**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 500 grams or more, that is, approximately 1061 grams, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 27, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

CLIFFORD WHITE

knowingly and intentionally possessed with intent to distribute of 5 grams or more, that is,
approximately 5.92 grams, of a mixture and substance containing a detectable
amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 27, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

CLIFFORD WHITE

knowingly and intentionally possessed with intent to distribute of a mixture and substance
containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

NOTICE OF FORFEITURE

1. As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1), 841(b)(1)(A) and 841(b)(1)(B), set forth in this indictment, defendants

CLIFFORD WHITE and WAYNE BRIGGS

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offenses: and

(b) any property constituting, or derived from, any proceeds obtained directly or indirectly from the commission of such offenses.

2. If any of the property subject to forfeiture, as a result of any act or commission by the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to

forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**